IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF LOUISIANA ALEXANDRIA DIVISION

UNITED STATES OF AMERICA	
Plaintiff,	
v.)	CIVIL ACTION NO. 69-14430
CATAHOULA PARISH SCHOOL BOARD, et al.)	Judge D. Drell
Defendants.	

FIRST JOINT REPORT IN RESPONSE TO THE COURT'S APRIL 2, 2019 ORDER

The United States of America ("United States") and the Catahoula Parish School Board ("Board")(collectively "the Parties") respectfully file this joint report as required by this Court's April 2, 2019 Order. The purpose of this joint report is to inform the Court of the actions taken to address facility repair at and assignment of certified teachers to Block High School.

On April 4, 2019, the United States sent a letter to the Board asking them to provide, in writing, (1) a final plan regarding the proposed closure of Jonesville Junior High and assignment of grades six and seven from Jonesville Junior High into Block High, and (2) a list of all actions already taken, those in progress, and those proposed to be completed prior to the beginning of the 2019-20 school year, which address the repair and upkeep of the facilities at, and the assignment of certified teachers to Block High School. The Board provided a written response to the United States on April 18, 2019. (*See attached*, Exhibit A, Proposed Plan to Close and Consolidate.)

The parties engaged in multiple subsequent conversations to discuss specifics of the closure and consolidation plan. On May 22, 2019, the United States informed the Board that, with the understanding that the Board will successfully effectuate the actions described in the April 18, 2019 written plan, the government does not object to the Board's motion to close

Jonesville Junior High School. The United States will schedule a site visit of Block High School once the Board completes all of the actions described in the April 18, 2019 Plan.

With regard to assignment of certified teachers to Block High School, the Board, since February of 2019, has hired and assigned to that school an English teacher, a social studies teacher, a guidance counselor, and the acting principal, all of whom are certified. In addition, two (2) uncertified teachers at the school are close to finishing the requirements for obtaining certification. Furthermore, of the nineteen (19) teachers needed to implement Block High's 2019-20 class schedule, the Board has received letters of intent from eighteen (18) certified teachers. The Board is continuing to exercise the recruitment procedures outlined in its previous filings with the Court and will make every effort to fill the remaining open position with a certified teacher.

Dated: May 24, 2019

Respectfully submitted,

HAMMONDS, SILLS, ADKINS & GUICE, LLP

2431 S. Acadian Thruway, Suite 600 Baton Rouge, Louisiana 70808 Telephone: (225) 923-3462

Facsimile: (225) 923-0315

/s/ Robert L. Hammonds

ROBERT L. HAMMONDS Bar Roll No. 6484 PAMELA WESCOVICH DILL Bar Roll No. 31703 JOHN R. BLANCHARD Bar Roll No. 37036 ERIC DREIBAND
Assistant Attorney General
Civil Rights Division

SHAHEENA SIMONS, Chief FRANZ R. MARSHALL, Deputy Chief Educational Opportunities Section

/s/Colleen Phillips

COLLEEN PHILLIPS, Trial Attorney U.S. Department of Justice Civil Rights Division Educational Opportunities Section Patrick Henry Building, Suite 4300 950 Pennsylvania Ave., NW Washington, D.C. 20530 (202) 307-6548 Colleen.Phillips@usdoj.gov

CATAHOULA PARISH SCHOOL BOARD

Proposed Plan to Close and Consolidate

EXHIBIT A

Proposed Plan to Close and Consolidate

1.

- a. It is estimated that there would be thirty-six (36) students in 6th grade and forty (40) students in 7th grade added to the student population at Block High School if the proposed consolidation is approved.
- b. Based on estimated student numbers, five (5) general education classrooms will accommodate a schedule for all ELA, math, science, and social studies curriculum. Superintendent Lofton intends to put those seventy-six (76) students and thirty-three (33) students from the 8th grade into empty classrooms located in A Building.
- c. Based on the number of special education students currently enrolled, one additional classroom in A Building will be utilized for a grade 6-8 special education resource classroom. Three (3) self-contained special education students currently at Jonesville Junior High School will be moved into the current self-contained special education classroom in C Building of Block High School.
- d. Keyboarding and computer lab for grades 6-8 will be held in the existing computer in B Building, which is fully functional and can house the class sizes needed. Band/music classes for all grades at Block High School will be held in the existing band room in C Building.

2.

- a. Both bathrooms in A Building at Block High School will be cleaned, painted, floors repaired, lighting repaired, ceilings repaired, and stall doors repaired. In addition, new sinks will be placed along with new toilets and urinals as necessary. All of this work will be completed on or before August 1, 2019.
- b. New LED bulbs have been ordered for the light fixtures in A Building classrooms. Illumination in the A Building classrooms will be equal to or greater than that in other classrooms in the school or in classrooms at Jonesville Junior High. The goal of the system is to upgrade its lighting in the A Building classrooms before the end of this school year.¹
- c. All flooring in A Building classrooms will be replaced with new flooring. This will be done in July so that the new flooring will not be damaged by other projects and so that the costs of such new flooring can be paid for from the 2019-2020 budget year (July 1, 2019 June 30, 2020).
- d. A deep clean of A Building will begin immediately, including all classrooms, hallways, and bathrooms. Classroom floors not currently carpeted will be cleaned in preparation for the new flooring, and any needed repairs to the flooring will be done. HVAC units, duct work, etc. will be cleaned after school is out for the summer. The deep cleaning and painting of the classrooms will be done in April/May. The hall floor will be stripped and waxed after school is out for summer.

¹ The Board completed installation of the new LED bulbs prior to the filing of this document.

e. The wireless internet system in A Building is working well and able to handle the number of 6th and 7th grade students expected to enroll. The fire alarm system, fire extinguishers, and intercom system in A Building are in good working order.